

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

KENNETH CROWELL and BERNICE)
BRANCH,)
)
Plaintiffs,) Case No. 14 cv 00565
v.)
) Judge Thomas M. Durkin
CITY OF CHICAGO, a municipal)
corporation; DONALD BRANCH, star no.)
4594; and ANTON WHITE, star no. 19533,)
)
Defendants.)

**DEFENDANT DONALD BRANCH'S MOTION
FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**

Defendant Donald Branch, by counsel, respectfully requests that the Court extend the time he has to file a responsive pleading to the Third Amended Complaint filed by plaintiffs Kenneth Crowell and Bernice Branch ("Plaintiffs"), to and including May 15, 2014. In support of this motion, Defendant states as follows:

1. On March 4, 2014, without leave of this Court, Plaintiffs filed a two-count Third Amended Complaint alleging Section 1983 violations by all defendants to this action as well as negligent retention by the City of Chicago.
2. On April 3, 2014, this Court formally granted Plaintiffs leave to file their Third Amended Complaint.
3. On April 9, 2014, this Court granted Donald Branch's motion for attorney representation and his application to proceed *in forma pauperis*, recruiting Anna-Katrina S. Christakis of the law firm Pilgrim Christakis LLP to assist him in defending this action.

4. To date, Donald Branch has not yet had an opportunity to meaningfully confer with his newly retained counsel regarding his defense of this action.

5. Donald Branch accordingly requests an extension of time to file a responsive pleading to the Third Amended Complaint, to and including May 15, 2014.

WHEREFORE, Defendant Donald Branch respectfully requests that the Court extend the time he has to file its answer or to otherwise plead to Plaintiff's complaint, to and including May 15, 2014.

Respectfully submitted,
DONALD BRANCH
By: /s/ Angad S. Nagra
One of his Attorneys

Anna-Katrina S. Christakis
Angad S. Nagra
Pilgrim Christakis LLP
53 West Jackson Boulevard, Suite 1515
Chicago, Illinois 60604
Ph. (312) 924-1773
Fax (312) 939-0983

CERTIFICATE OF SERVICE

Angad S. Nagra, an attorney, certifies that on April 24, 2014, he electronically filed the foregoing **DEFENDANT DONALD BRANCH'S MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE PLEAD**, with the Clerk of the Court by using the CM/ECF system, which will send a notice of electronic filing to all counsel of record.

/s/ Angad S. Nagra